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**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

IN RE: SOCIAL MEDIA ADOLESCENT  
ADDICTION/PERSONAL INJURY  
PRODUCTS LIABILITY LITIGATION

No. 4:22-md-03047

MDL No. 3047

This Document Relates To:

N.K., filed on behalf of minor S.K. v. META  
PLATFORMS, INC., et al. | Case No. 23-CV-  
1584

**MOTION FOR LEAVE TO FILE  
COMPLETE EVIDENCE IN SUPPORT  
OF PLAINTIFFS' LETTER BRIEF  
REGARDING PERSONAL INJURY  
BELLWETHER POOL**

Judge: Hon. Yvonne Gonzalez Rogers

**Date:** June 13, 2025

**Time:** 9 a.m.

**Courtroom:** 1

Plaintiff S.K. respectfully moves to file the attached Declaration of Lance V. Oliver and the attached Exhibit A in support of Plaintiff's Letter Brief Regarding Personal Injury Bellwether Pool (ECF 1967). In support of this Motion, Plaintiff states the following:

1. In their Letter Brief Regarding Trial Selection of Bellwether Personal Injury Cases (ECF 1966), Defendants claim that S.K. has "ceased meaningfully participating in this lawsuit" and

1 that undersigned counsel has claimed that continuing will be “harmful to her [S.K.’s] mental health.”  
2 These statements are not true.

3           2.       In support of their assertions, Defendants attach an email chain, Exhibit F. They did  
4 not, however, attach the complete chain of conversation. The Oliver Declaration attaches the entire  
5 email chain, which reflects that Plaintiff and Defendants reached a compromise: one Defendants  
6 were “open” to. The chain also reflects that Plaintiffs are and have remained more than willing to  
7 engage in discovery as long as it is reasonable and the parties can reach an agreement on the timing  
8 of that discovery.

10           3.       Plaintiff remains committed to this litigation. Plaintiff has been participating in  
11 discovery and is willing to sit for an update deposition. The disagreement the parties have is over  
12 the timing and scope of update discovery and nothing more.

14           4.       Plaintiff submit this out of an abundance of caution so that the Court understands  
15 S.K. is not refusing to participate in this lawsuit and continues to be fully committed to being a part  
16 of the first trial bellwether pool.

18           Dated: June 26, 2025

/s/ Lance V. Oliver

19           Lance V. Oliver

20           LANCE V. OLIVER  
21           **MOTLEY RICE LLC**  
22           28 Bridgeside Blvd.  
23           Mount Pleasant, SC 29464  
24           loliver@motleyrice.com

*Counsel for Plaintiff*